

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

ALICIA M. PAGE, CARMEL COOPER,
and CINDY MUNIZ, individually, and on
behalf of all others similarly situated,

Plaintiffs,

vs.

ALLIANT CREDIT UNION, and DOES 1-
100,

Defendants.

Case No.: 1:19-cv-05965

Hon. Sharon Johnson Coleman

DECLARATION OF JEFFREY C. BILS
IN SUPPORT OF PLAINTIFF ALICIA M. PAGE'S
MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

I, Jeffrey C. Bils, declare and state as follows:

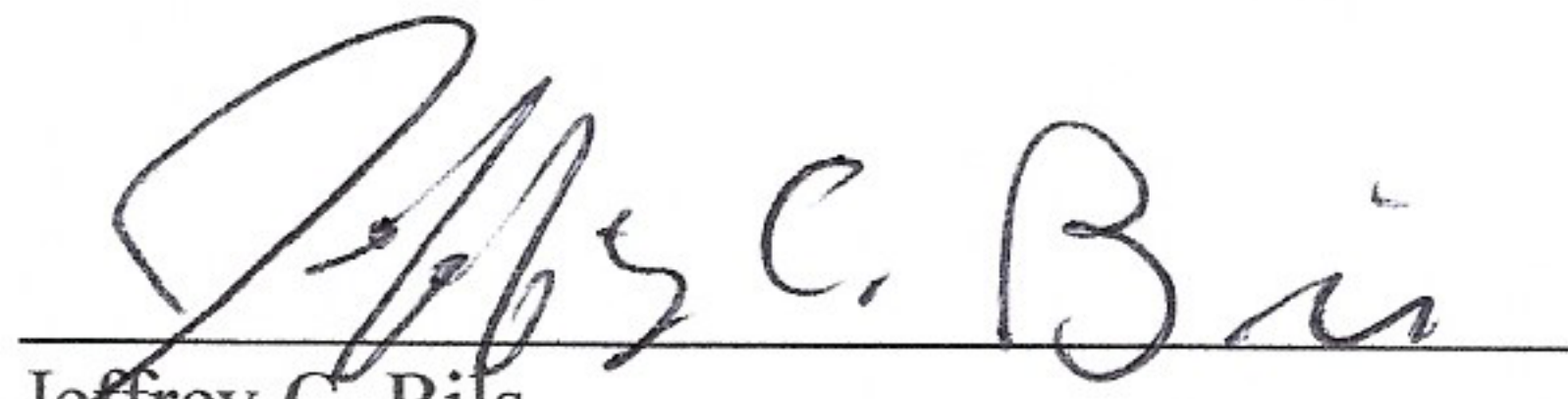
1. I am an attorney at law duly licensed to practice before all courts in the State of California. I am employed by The Kick Law Firm, APC, and counsel of record for Plaintiff Alicia M. Page in this action. I have personal knowledge of the facts set forth in this declaration and, if called as a witness, could and would testify competently to such facts under oath.

2. On August 27, 2020, I conducted research using the Internet Archive Wayback Machine at <https://archive.org/web/> to find past and present contracts, disclosures, fee schedules and related account documents for Defendant Alliant Credit Union. During this research, I found Alliant's Account Agreement and Disclosures dated August 2019. A true and correct copy of the Further Revised Contract that I found is attached as **Exhibit A**.

1 subject to appropriate social distancing measures.

2 6. On October 6, 2020, I used the website <https://www.google.com/maps/> to
3 estimate the following driving times: The drive from Benton County to King County along I-82
4 and I-90 is approximately 185 miles and takes approximately three hours. The drive from
5 Franklin County to Benton County along US-395 and I-182 is approximately 50 miles and takes
6 approximately one hour. The drive from Franklin County to King County along I-90 would be
7 less than 200 miles and take approximately three hours and 15 minutes.

8 I declare under penalty of perjury under the laws of the State of Washington that the
9 foregoing is true and correct. Executed on October 8, 2020 at Beverly Hills, California.

10
11 
12 Jeffrey C. Bils